

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MICHAEL JONES,)
Plaintiff,)
v.) Case No. 4:21-CV-00137
CITY OF ST. LOUIS, et al.,)
Defendants.)

DEFENDANTS' MOTION TO STAY PROCEEDINGS

COME NOW Defendants, by and through their attorney Sheena Hamilton, City Counselor for the City of St. Louis, and pursuant to Federal Rule of Civil Procedure 26(c), hereby move for an order to stay proceedings in this matter, and in support thereof state:

1. In this action, Plaintiff seeks damages resulting from an eight-month period of incarceration during which he alleges there were no charges pending against him. He also seeks damages for having been subjected to alleged “unsanitary” and other “poor conditions” during his confinement. (*See Doc. 16*)
2. On May 24, 2021, Defendants filed a motion to dismiss the Amended Complaint arguing, in part, that Plaintiff’s claims were time-barred by the applicable statute of limitations. (Doc. 20). Defendants’ motion to dismiss the Amended Complaint was fully briefed on July 4, 2021. (Doc. 34). To date, the Court has yet to rule on Defendants’ motion to dismiss.
3. This Court should stay proceedings in this matter because: 1) Plaintiff is a member of a class action lawsuit currently pending against City for jail conditions; and 2) the Court has yet to rule on Defendants’ motion to dismiss.

4. Defendants submit herewith and thereby incorporate their memorandum of law in support of their motion.

WHEREFORE Defendants request this matter be stayed, and for any other relief this Court deems just and proper under the circumstances.

Respectfully Submitted,

SHEENA HAMILTON
CITY COUNSELOR

/s/ Abby Duncan
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Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2022, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system.

/s/ Abby Duncan